

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

CT102 LLC d/b/a Metro Motors and H.
Jeffrey Baker

Plaintiffs,

v.

Automotive Finance Corporation d/b/a AFC;
NextGear Capital, Inc.; Manheim, Inc. and
ADESA, Inc.,

Defendants.

Civil Action No.: 1:20-cv-356-MSM-PAS

**OPPOSITION OF PLAINTIFFS CT102, LLC AND H. JEFFREY BAKER TO
DEFENDANTS AUTOMOTIVE FINANCE CORPORATION D/B/A AFC AND ADESA,
INC.'S MOTIONS TO DISMISS**

Now come Plaintiffs, CT102, LLC d/b/a Metro Motors and H. Jeffrey Baker to oppose the Motions to Dismiss of Defendants Automotive Finance Corporation d/b/a AFC and ADESA, Inc. for the reasons set forth in the accompanying Memorandum of Law in Support of Opposition of Plaintiffs to this Motions to Dismiss under Rules 12(b)(2) and 12(b)(6). For judicial economy, Plaintiffs file a single opposition to the Rule 12 Motions of those commonly owned Defendants.

Dated: January 21, 2022

Respectfully submitted,

**CT102 LLC d/b/a Metro Motors and H.
Jeffrey Baker,**
Plaintiffs,
By their Attorney,

/s/ Harris K. Weiner
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CERTIFICATE OF SERVICE

I, Harris K. Weiner, hereby certify that on January 21, 2022 a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to all counsel of record.

/s/ Harris K. Weiner